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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	Case No. CR 05-60008-HO
	)	
v.	)	GOVERNMENT'S PROPOSED
	)	VOIR DIRE
	)	
PIROUZ SEDAGHATY,	)	
a/k/a Pete Seda, Perouz Seda Ghaty	)	
and Abu Yunus	)	
	)	
Defendant.	)	

The United States of America, by and through its undersigned attorneys, hereby submits its proposed voir dire for the trial of Defendant Pirouz Sedaghaty now set for August 30, 2010.

The United States respectfully requests the Court to include the attached questions during its voir dire of the jury. Proposed questions are segregated by subject matter.

1 - Government's Proposed Voir Dire

### Education

1. Please explain your educational background.

### Employment

1. What is your occupation and, if you are married, the occupation of your spouse? If retired, please explain the type of employment prior to employment.
2. Do you have any children? If so, are they married, and what are their occupations?
3. Have you or a close family member ever worked for a charitable, non-profit, or religious organization? If so, what kind of organization was it? What were the assigned job or duties within the organization?

### Experience with Accounting or Banking

1. Have any of you ever worked in a job in which you had to perform bookkeeping, banking or accounting responsibilities? If so, please explain the nature of your work in that area.

### Military Service

1. Have you or any family member served in the United States Military? If so, please explain that service.

### Law Enforcement

1. Have you or any close family member served as a law enforcement officer? If so, please explain the nature of that work.

Prior Jury Service

1. Have any of you ever served on a trial jury in either federal or state court?  
  
If so, was it a civil or criminal case? If criminal, what type of case was it?  
  
Did the jury reach a verdict?

Experience with Criminal Justice System

1. Have you or any members of your family, or any friends, ever been charged with a criminal offense? If so, what was the nature of the offense and how was it resolved? Would this experience cause you to favor one side or another or prevent you from reaching a verdict based only on the law and evidence in this case?

Experience with FBI and IRS

1. This case was investigated by the Internal Revenue Service and the Federal Bureau of Investigation. Have you or any members of your family or any of your friends, to the best of your knowledge, had any experiences with the Federal Bureau of Investigation or the Internal Revenue Service, or any other agency of the United States government, that would or could prejudice you for or against the government?
2. Have you, your friends, or relatives ever been audited or assessed a penalty by the Internal Revenue Service? If so, please explain the nature of that experience and tell us whether it would cause you to favor one side or another.

Chechnya

1. This case will involve testimony about a part of the world called Chechnya. Are you familiar with Chechnya? If so, describe in general terms what you know about it.

Religious Practices

1. The defendant practices the religion of Islam. This case will involve evidence about Islam and the religious practices of some Muslims. Can you consider such evidence of religious beliefs and practices in an unbiased manner?
2. The government alleges that the defendant attempted to fund a group of fighters called mujahideen in Chechnya. Will you be able to consider such testimony in an unbiased manner?

Knowledge of Al-Haramain - Exposure to Media

1. Have you heard anything about the Al Haramain Islamic Foundation of Saudi Arabia, its American branch office in Ashland, Oregon, or the defendant Pirouz Sedaghaty (Pete Seda) before coming to court this morning? If so, please explain.

Travel

1. Have you ever traveled outside the United States? If so, where did you travel to and for what purpose?

Knowledge of Lawyers or Witnesses

1. I will have the lawyers read the names of their potential witnesses. Do any of you know any of the lawyers here or potential witnesses? If so, what is your relationship with such person?

Sensory Perception

1. Do you have any problems with your hearing or sight or any other medical problem which would impair your ability to devote full attention to this trial?

Length of Trial

1. This trial will likely run throughout the Labor Day holiday and take about two weeks to complete. Do you have any compelling reason that you would be unable to serve as a juror for that time?

DATED this \_\_\_\_\_ day of August, 2010.

Respectfully submitted,

DWIGHT C. HOLTON  
United States Attorney

*/s/ Christopher L. Cardani*

By: \_\_\_\_\_  
CHRISTOPHER L. CARDANI  
Assistant United States Attorney

*/s/ Charles F. Gorder, Jr.*

By: \_\_\_\_\_  
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